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Lead Counsel for Plaintiffs

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

CHAD ZUBRISKI AND GEORGE DERATNAY, Individually and on Behalf of All Others Similarly Situated,

Plaintiffs,

vs.

BIOAMBER INC., JEAN-FRANCOIS HUC, and MARIO SAUCIER,

Defendants.

Case No. 2:17-cv-01531-ADS-KAT

PLAINTIFFS' NOTICE OF MOTION FOR AN AWARD OF ATTORNEYS' FEES, REIMBURSEMENT OF EXPENSES, AND AWARD TO PLAINTIFFS PLEASE TAKE NOTICE that pursuant to Federal Rule of Civil Procedure 23(e), Lead

Plaintiff Chad Zubriski and Named Plaintiff George Deratnay ("Plaintiffs"), by their undersigned

counsel, hereby move this Court, before the Honorable Arthur D. Spatt, on May 20, 2020 at 9:00

a.m., or as soon thereafter as the parties can be heard, telephonically at the teleconference

number 866-434-5269, Access Code: 9025281, for an Order granting an award of attorneys'

fees, reimbursement of expenses, and award to Plaintiffs.

Plaintiffs will rely on the accompanying memorandum of law, the Declaration of

Jonathan Horne and exhibits attached thereto, and such further argument and briefing as may be

presented at or before any hearing. Plaintiffs will file a proposed final order and judgment with

its reply, to fully account for any requests for exclusions or objections received by the April 29,

2020 deadline.

Dated: April 22, 2020

Respectfully submitted,

THE ROSEN LAW FIRM, P.A.

/s/ Jonathan Horne

Jonathan Horne

Laurence M. Rosen

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CERTIFICATE OF SERVICE

I hereby certify that on April 22, 2020, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/ Jonathan Horne	